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**From:** Lisa Rector [lrector@nescaum.org]  
**Sent:** 8/19/2020 11:55:51 PM  
**To:** Johnson, Steffan [johnson.steffan@epa.gov]; Toney, Mike [Toney.Mike@epa.gov]; Brashear, Angelina [Brashear.Angelina@epa.gov]  
**Subject:** ASTM 2618 question

Hi US EPA Testing Team, I have a questions about pellet boilers using 2618 for certification. I have seen pellet boiler tests that state they did not operate in Category 1 and used the "Stopped Fuel Combustion" as a basis for allowing the use of two Category 2 tests. Here's the question. These are automatic feed units, the section about stopped fuel combustion (Section 12.2.13 – text below) only applies to cordwood appliances. The pellet fuels section provides no allowances for opting out of Cat 1 for 2 Category 2 tests. It states you must test in all categories for four hours.

So here are my questions:

- 1) Why are portions of the test method for cordwood units being applied to pellet units?
- 2) If there is a basis for using the cordwood sections with pellets why doesn't section 12.2.14 apply as well, which states appliances must operate in all categories and can't overheat, which the pellet boiler did?
- 3) If the pellet boiler didn't overheat, why wasn't the unit allowed to stay in idle mode until the unit cycled back on? This is similar to what cordwood appliances must do so I don't understand why pellet boilers can opt of cycling under 2618.

Thanks in advance for helping me resolve my confusion. Thanks!

Lisa



**Lisa Rector**, Policy and Program Director at **NESCAUM**

89 South Street, Suite 602, Boston, Massachusetts, 02111 | 802.899.5306 | 617.259.2095 | Fax: 617.742.9162

| [lrector@nescaum.org](mailto:lrector@nescaum.org)